

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

**MARK CARMAN, individual and
on Behalf of All Others Similarly
Situated**

Plaintiff(s),

v.

Civil Action No. 2:22-cv-00313

**PORTSMOUTH REDEVELOPMENT
AND HOUSING AUTHORITY,**

Defendant.

RULE 68 OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant Portsmouth Redevelopment and Housing Authority (the “Authority”), by and through their attorneys, Gordon Rees Scully Mansukhani, LLP, hereby offer to allow judgment to be taken against it and in favor of Plaintiffs Mark Carman and Marc Gonzalez, as follows:

1. Judgment shall be entered against Defendant in the amount of Twenty-Eight Thousand Three Hundred Twenty-Four Dollars (\$28,324.00) total, including attorney’s fees, in full and complete satisfaction of all of Plaintiffs’ claims against Defendant alleged in this action.

a. Four Thousand Eight Hundred and Fifty-Nine Dollars and Fifty Cents (\$4,859.50) is for Plaintiff Carman’s FLSA wages and Four Thousand Eight Hundred and Fifty-Nine Dollars and Fifty Cents (\$4,859.50) is for Plaintiff Carman’s liquidated damages; and

b. Four Thousand Three Hundred and Two Dollars and Fifty Cents (\$4,302.50) is for Plaintiff Gonzalez’s FLSA wages and Four Thousand Three Hundred and

Two Dollars and Fifty Cents (\$4,302.50) if for Plaintiff Gonzalez's liquidated damages; and,

c. Ten Thousand Dollars (\$10,000.00) is for attorney's fees.

2. The judgment of Twenty-Eight Thousand Three Hundred and Twenty-Four Dollars (\$28,324.00) to be entered shall be inclusive of all of the Plaintiff's damages and remedies, equitable and legal. In addition, this judgment shall include all of Plaintiff's costs, expenses and attorney's fees incurred by Plaintiff in connection with the claims alleged in this action up until the date of this offer of judgment.

3. This offer of judgment is made solely for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission that Defendant is specifically liable in this action.

4. If Plaintiff does not serve a written notice accepting this offer of judgment within the time required under Rule 68, this offer of judgment will be considered to be unaccepted without further notice.

PORTSMOUTH REDEVELOPMENT AND
HOUSING AUTHORITY


By: 

Susan Childers North, Esq. (VSB #43068)
Jonathan W. Gonzalez, Esq. (VSB # 92259)
Gordon Rees Scully Mansukhani, LLP
5425 Discovery Park Boulevard Suite 200
Williamsburg, VA 23188
T: 757-903-0870
F: 757-401-6770
snorth@grsm.com
jwgonzalez@grsm.com
*Counsel for Portsmouth Redevelopment and
Housing Authority*

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 2023, I electronically filed the foregoing with the Clerk of Court via the CM/ECF System, which will send electronic notification to the following:

Sean Short, Esq.
Krista Sheets, Esq. (VSB #97730)
SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, AR 72211
Telephone: (501) 221-0088
Facsimile: (888) 787-2040
sean@sanfordlawfirm.com
Krista Sheets, Esq. (VSB #97730)
Counsel for Plaintiffs


Susan Childers North, Esq. (VSB # 43068)
Gordon Rees Scully Mansukhani, LLP
5425 Discovery Park Boulevard Suite 200
Williamsburg, VA 23188
T: 757-903-0870
F: 757-401-6770
snorth@grsm.com
*Counsel for Portsmouth Redevelopment and
Housing Authority*